

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION

STATE FARM FIRE AND CASUALTY COMPANY,	)	Civil Action No. 2:21-cv-1063-RMG
	)	
	)	
Plaintiff,	)	
	)	
vs.	)	<b>DEFENDANT ALAN JOSEPH LANG'S</b>
	)	<b>EXPERT DISCLOSURE</b>
ALAN JOSEPH LANG and MICHAEL J. PATTERSON,	)	
	)	
	)	
Defendants.	)	
	)	

---

Defendant Alan Joseph Lang, through his undersigned attorney, submits the following Expert Disclosure pursuant to Rule 26 of the Federal Rules of Civil Procedure.

In compliance with FRCP 26(a)(2)(B), Defendant Lang identifies the following witness:

ANSWER: Thomas H. Hesse, Esquire  
Austen and Gowder, LLC  
1629 Meeting Street, Suite A  
Charleston, SC 29405

See Mr. Hesse's attached report, curriculum vitae, and other documents and information required by FRCP 26(a)(2)(B).

**PIERCE SLOAN KENNEDY & EARLY, LLC**  
The Blake House  
321 East Bay Street (29401)  
PO Box 22437  
Charleston, South Carolina 29413  
843-722-7733/843-722-7732 fax

s/ William O. Sweeney IV  
Carl E. Pierce, II (3062)  
[carlpierce@piercesloan.com](mailto:carlpierce@piercesloan.com)  
William O. Sweeney IV (10727)  
[billysweeney@piercesloan.com](mailto:billysweeney@piercesloan.com)  
Attorneys for Defendant Alan Joseph Lang

January 7, 2022  
Charleston, SC